

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

ELIJAH MCCANT FINLEY,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:07-cv-00280-MEF-CSC
)	
JAY JONES, et al.)	
)	
Defendants.)	

MOTION FOR EXTENSION OF TIME TO FILE SPECIAL REPORT AND ANSWER

COME NOW Lee County Sheriff Jay Jones, Defendant in the above-styled cause, and moves this Court to grant him an extension of time to file his Special Report and Answer. As grounds for this Motion, this Defendant states as follows:

1. The Court ordered Defendant to file his Special Report on May 29, 2007 and Answer on May 30, 2007.
2. Defendant is in need of additional time to fully investigate Plaintiff's claims to provide the Court with a meaningful and complete Special Report.
3. Defendant has not previously requested an extension of time to file his Special Report and Answer.
4. Plaintiff will not be prejudiced by an extension of time.

WHEREFORE Defendant Sheriff Jay Jones requests this Court grant him an extension of time to file his Special Report and Answer on or before June 29, 2007.

Respectfully submitted this 25th day of May, 2007.

s/Ashley Hawkins Freeman

ASHLEY HAWKINS FREEMAN Bar No. FRE044

Attorney for Defendant Jay Jones

WEBB & ELEY, P.C.

7475 Halcyon Pointe Drive (36117)

Post Office Box 240909

Montgomery, Alabama 36124

Telephone: (334) 262-1850

Fax: (334) 262-1889

E-mail: afreeman@webbeley.com

CERTIFICATE OF SERVICE

I hereby certify that on this the **25th** day of **May, 2007**, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and that I have mailed a true and correct copy of the foregoing by United States Mail, postage prepaid, to the following non-CM/ECF participant:

Elijah McCant Finley
Lee County Detention Facility
P.O. Box 2407
Opelika, AL 36803

s/Ashley Hawkins Freeman
OF COUNSEL